

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.
Shawn Eugene-Cornell Green

Case No. 20-8-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 4, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 111(a)(1)	Assault on an Officer in the Performance of Official Duties

This criminal complaint is based on these facts:

On January 4, 2020, at Independence National Historical Park in Philadelphia, the defendant entered a secure area of Independence Hall and did knowingly and intentionally assault, resist, oppose, impede and interfere with a SECTEK Security Guard assisting Park Rangers in the performance of their duties by striking SECTEK Guard Christian Santell-Torres as he attempted to remove the defendant from the secured area of Independence Hall, an area the defendant was unauthorized to enter, in violation of 18 U.S.C. Section 111(a)(1).

☒ Continued on the attached sheet.

[Signature] #1109
Complainant's signature

National Park Ranger Jordan R. Keiffer

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/6/2020

[Signature]
Judge's signature

City and state: Philadelphia, Pennsylvania

David R. Strawbridge, Magistrate Judge

Printed name and title

AFFIDAVIT

1. Your Affiant is Jordan Keiffer and I am a sworn law enforcement officer employed as a United States Park Ranger by the National Park Service (NPS). I have been an employee of the NPS for five years. In 2014, I completed a fourteen week training program at the Temple University Seasonal Law Enforcement program. In 2016, I attended and graduated from the Land Management Police Training program at the Federal Law Enforcement Academy located in Glynco, Georgia. In 2016, I also successfully completed an eleven week field training program at the Everglades and Biscayne National Parks.

2. The Independence Hall, located at 570 Chestnut Street in Philadelphia, has a secured area that can only be accessed by park visitors who enter through security screening during daytime operating hours. At night, the secured area is closed to the public. Independence National Historical Park contracts security for these areas through the company SECTEK, such that these guards are persons designated in 18 U.S.C. §1114 as protected by 18 U.S.C. §111. Two SECTEK guards are stationed at all times at the East and West wings of the block to ensure no individuals enter the secured area by entering the gates or climbing under or over the chain-link fence.

3. On January 4, 2020, at approximately 5:42 p.m., after the secured area of Independence Hall was closed to the public, the defendant, Shawn Eugene-Cornell Green, entered the secured area of Independence Hall. SECTEK Guard Christian Santell-Torres informed the defendant that he could not be present in the secured area and had to cross back to the other side of the street. The defendant initially walked back towards the chain-link security fence but then turned around and walked back towards Guard Santell-Torres. As a result of the

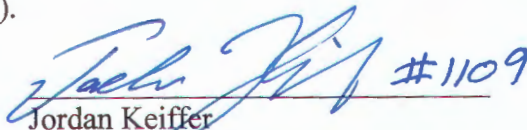
defendant's unwillingness to comply, Guard Santell-Torres attempted to physically restrain the defendant, who proceeded to repeatedly punch Guard Santell-Torres.

4. Your affiant, along with other NPS officers, arrived to the scene to assist Guard Santell-Torres and attempted to place the defendant into handcuffs. The defendant continued to physically resist the officers as he shouted slurs directed at Guard Santell-Torres. Despite repeated requests by NPS officers to the defendant put his arms behind his back, he continued to physically resist the officers. Eventually, despite his continued resistance, NPS officers were able to place the defendant into handcuffs.

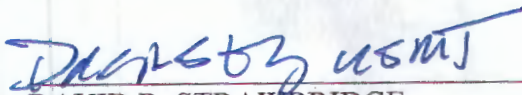
5. Guard Santell-Torres was then transported to Jefferson Hospital, where he was treated for a sprained right wrist and hand, and swollen knuckles and index-finger. Guard Santell-Torres also reported chest pains.

6. The location of the assault by the defendant was on the 500 block of Chestnut Street, within the federal property of Independence National Historic Park.

7. Based on the facts set forth above, I request an arrest warrant for defendant Shawn Eugene-Cornell Green, charging him with assault on an officer in the performance of official duties, in violation of 18 U.S.C. §111(a)(1).

 #1109
Jordan Keiffer
National Park Ranger

Subscribed and sworn to before me
this 6th day of January 2020,
at Philadelphia, PA


DAVID R. STRAWBRIDGE
United States Magistrate Judge